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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CLYDE PAINT AND SUPPLY CO.
CLYDE, OHIO
OHD 005 048 459

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Clyde Paint and Supply Company (CPS) facility in Clyde, Ohio. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The CPS facility recycled paint sludges from various industrial manufacturing plants. The sludges consisted of paint overspray removed from other industrial facility's water-wash spray booths. The facility recycled the sludge into paint either conforming to the original specification or to another standard requested by the customer. CPS operated from 1951 to December 1985. The facility occupies 1 acre of land and employed approximately 30 people while in operation. CPS operated as an interim status RCRA treatment, storage, or disposal (TSD) facility, until the Ohio EPA (OEPA) certified the facility closed in June 1990. The facility property is currently owned and operated by Naggy Auto Body.

The PA/VSI identified the following 4 SWMUs at the facility:

Solid Waste Management Units

1. Container Storage Area
2. Outdoor 6,000-gallon Underground Storage Tank
3. Indoor 3,000-gallon Underground Storage Tank
4. Indoor 2,000-gallon Underground Storage Tank

Area of Concern

1. Unidentified Container

The potential for a release of hazardous constituents to environmental media from this facility is low. OEPA has certified SWMU 1 closed, and wastes are no longer generated or managed on site.

The Outdoor 6,000-gallon Underground Storage Tank (SWMU 2) did have a high potential for release to ground water while in use. SWMU 2 was an underground storage tank that stored hazardous waste with no release controls. However, the tank was removed and found to be in good physical condition, and no other SWMU posed a significant threat of release while in operation.

No known releases to ground water have occurred from the CPS facility. The City of Clyde obtains its drinking water from a reservoir located approximately 1 mile southeast (downgradient) of the facility, and the nearest ground-water production well is located approximately 1.25 miles northeast of the facility.

No known releases to surface water have occurred from the CPS facility. The nearest surface water body, Raccoon Creek, borders the facility on the west side and is used for recreation.

No known on-site contamination and no known releases to the air have occurred in the surrounding area. Residential areas border the facility, but the facility is completely fenced and locked when no facility personnel are on site. The nearest sensitive environment to the facility is located over 4 miles to the northeast.

PRC does not recommend any further action for the CPS facility.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Clyde Paint and Supply Company (CSP) facility in Clyde, Ohio.

The PA was completed on April 5, 1991. PRC gathered and reviewed information from Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files.

The VSI was conducted on May 21, 1991. It included interviews with Naggy Auto Body (currently operating at the CPS location) facility representatives and a walk-through inspection of the facility. No CPS facility personnel were available for the VSI. Four SWMUs and one AOC were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and twelve inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The CPS facility is located at 435 West Mulberry Street in the City of Clyde, Sandusky County, Ohio (latitude 41°18'30.3", longitude 82°58'34.3"). The facility occupies 1 acre of land in a predominantly residential area.

The CPS facility is bordered by Raccoon Creek to the west, and residential areas to the north, south, and east. Vine Street and St. Mary's School are located approximately 600 feet to the east. An unnamed pond is located approximately 200 feet southwest of the facility, and a park is located approximately 1,000 feet south of the facility (see Figure 1).

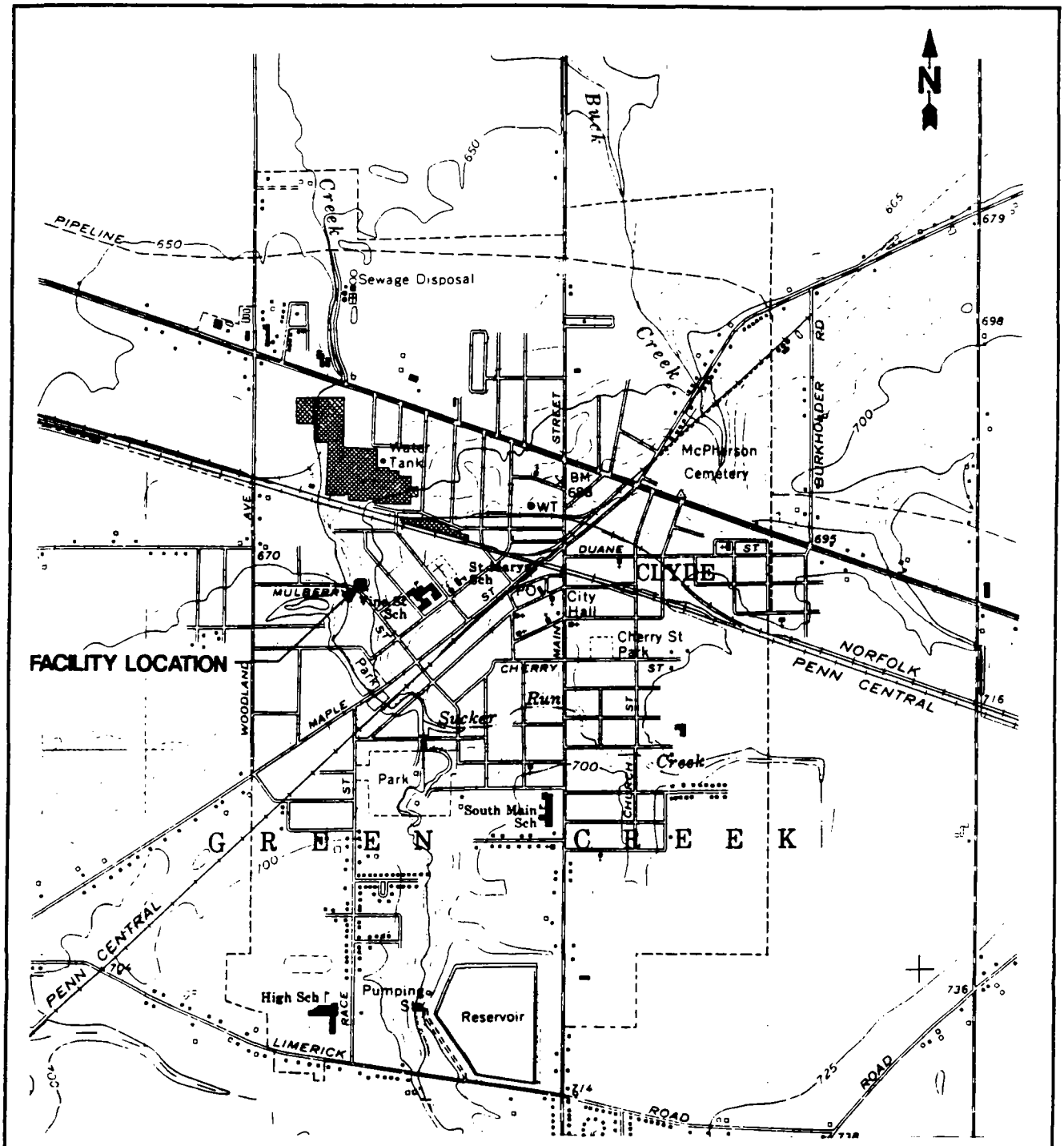
There is a steel fence surrounding the facility with a locked gate at the southwest corner of the building. The building is also kept locked when no facility personnel are on-site.

2.2 FACILITY OPERATIONS

The CPS facility operated from 1951 to December 1985. The facility employed approximately 30 people at the time of operations. The facility property is currently owned and operated by Naggy Auto Body.

The CPS facility recycled paint sludges from various industrial manufacturing plants. The sludges consisted of paint overspray removed from the industrial plants' water-wash spray booths. The sludges arrived in 55-gallon containers. The facility recycled the sludge into paint either conforming to the original specification or to another standard. The facility ceased recycling operations on December 31, 1985.

A total of four SWMUs and one AOC were identified during the VSI. SWMUs are listed in Table 1. Locations of SWMUs are identified in Figure 2. The facility operated one container storage area (CSA) (SWMU 1) that stored D007 and D008 paint sludges, F003 waste, and D001 waste from recycling operations. The facility also operated three underground storage tanks (UST) (SWMUs 2, 3, and 4). According to correspondence with Jefferey Steers of OEPA, OEPA believes the three USTs managed waste toluene (F003), waste mineral spirits (D001) and waste butyl alcohol respectively (PRC, 1991).



CLYDE PAINT & SUPPLY CO.
CLYDE, OHIO

FIGURE 1
FACILITY LOCATION

SOURCE: USGS 1969 SW/4 BELLVEVUE 15' QUADRANGLE

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 1

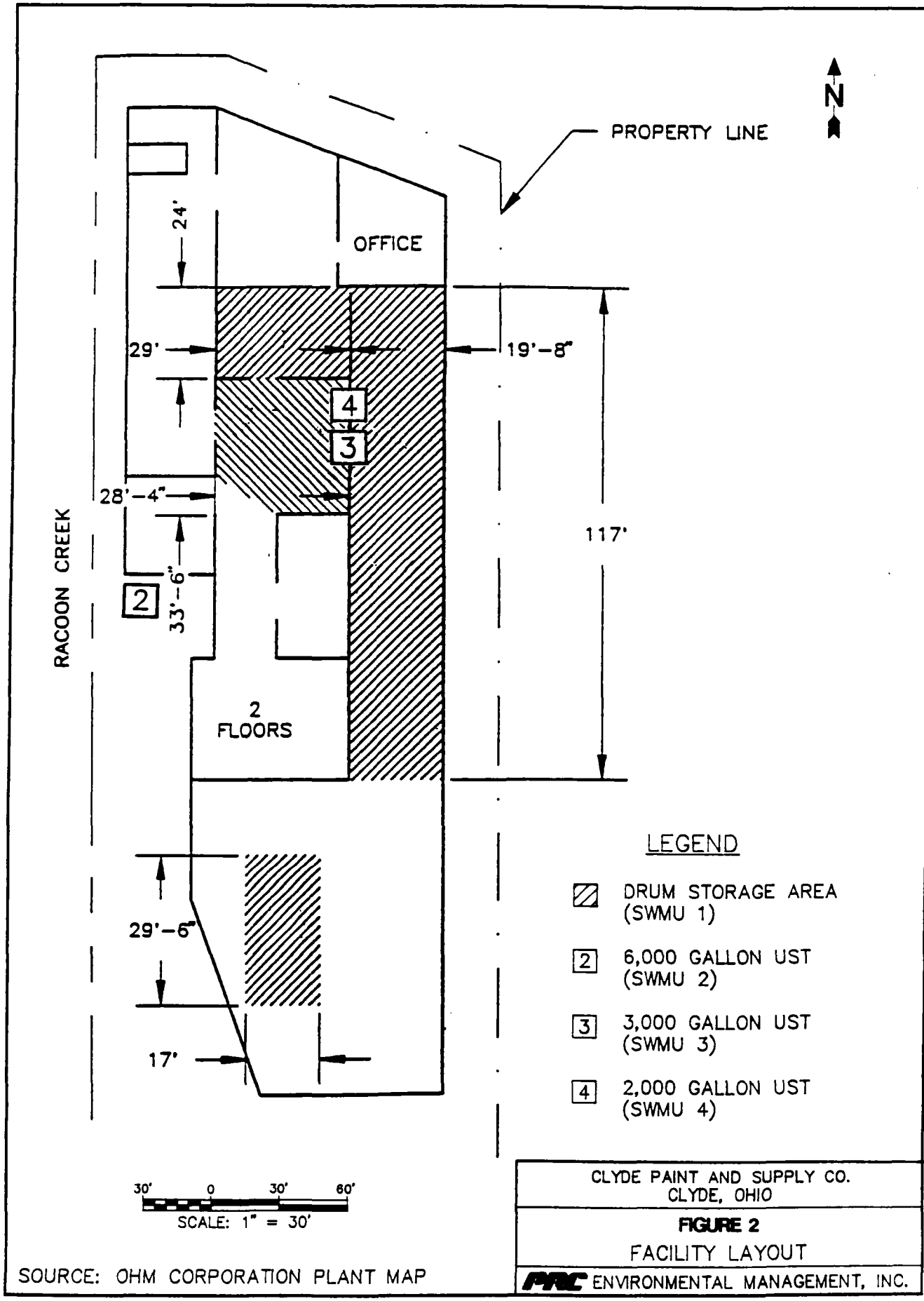
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Container Storage Area	Yes	Closed in 1990
2	Outdoor 6,000-gallon Underground Storage Tank	No**	Closed in 1989
3	Indoor 3,000-gallon Underground Storage Tank	No**	Closed in 1989
4	Indoor 2,000-gallon Underground Storage Tank	No**	Closed in 1989

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

** These SWMUs were not included in the part A permit application. However, OEPA considered these USTs, solid waste management units in a phone memo between PRC and OEPA dated September 6, 1991 (PRC, 1991).


N
PROPERTY LINE
OFFICE
24'
29'
19'-8"
4
3
28'-4"
33'-6"
2
117'
RACOON CREEK
2
FLOORS
29'-6"
17'
LEGEND
DRUM STORAGE AREA (SWMU 1)
2 6,000 GALLON UST (SWMU 2)
3 3,000 GALLON UST (SWMU 3)
4 2,000 GALLON UST (SWMU 4)
30' 0 30' 60'
SCALE: 1" = 30'
SOURCE: OHM CORPORATION PLANT MAP
CLYDE PAINT AND SUPPLY CO.
CLYDE, OHIO
FIGURE 2
FACILITY LAYOUT
ENVIRONMENTAL MANAGEMENT, INC.

The facility has gone through RCRA closure for all the units, and OEPA has certified the facility closed (OEPA 1990a). Wastes are no longer generated or stored on site by CPS or currently operating Naggy Auto Body.

2.3 WASTE GENERATING PROCESSES

The CPS facility discontinued recycling and waste generation processes in December 1985. From 1951 until 1985, the facility recycled paint sludges from various manufacturing plants. Sludges consisted of paint overspray removed from water-wash paint spray booths. The sludge was recycled into paint conforming to the original specifications or to other standards requested by the customers. Table 2 lists the solid wastes managed at the facility, their sources, and the SWMUs that handled them.

The facility generated sludge waste from recycling operations that was EP toxic for chromium (D007) and lead (D008). The sludges were stored in the CSA (SWMU 1) in 55-gallon containers.

The facility also generated spent mineral spirits that were ignitable (D001) and toluene waste (F003) from recycling operations. These two waste streams were also stored in the CSA (SWMU 1) in 55-gallon containers.

After the facility ceased recycling operations in December 1985, all containerized wastes were removed and disposed of by Michigan Recovery Systems, Inc. (MID 060 975 844) (CEE, 1988).

The facility also had three USTs. During the VSI, Lynn Naggy of Naggy Auto Body, the current operators at the site, stated that the three USTs contained product xylene, mineral spirits, and butyl alcohol. However, according to Jefferey Steers of OEPA, the three USTs possibly contained hazardous waste (PRC, 1991). CPS included the closure of the three USTs in its hazardous waste CSA closure plan.

At the time of the inspection, PRC could not determine whether product xylene or waste xylene (F003) was managed in the outdoor 6,000-gallon UST (SWMU 2), product mineral spirits or spent mineral spirits (D001) was managed in the indoor 2,000-gallon UST (SWMU 3), and product butyl alcohol or spent butyl alcohol was managed in the indoor 3,000-gallon UST (SWMU 4). In December 1988, all of the contents were removed from the USTs and closure activities began.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Paint sludge/D007, D008	Off Site Industrial Plant	1
Waste paint/D001	Recycling operations	1
Waste mineral spirits/D001	Recycling operations	1 and 3
Xylene waste/F003	Recycling operations	1 and 2
Waste butyl alcohol	Recycling operations	4

Note:

* Primary management unit refers to a SWMU that managed the waste prior to closure.

2.4 RELEASE HISTORY

No known releases to the surrounding environment have occurred from the CPS facility. However, during decontamination of the indoor CSA, the first two rounds of rinsate samples showed elevated levels of metals, primarily chromium and lead (OHM, 1990). The third round of sampling showed concentration reductions, and OEPA certified the facility closed (OEPA, 1990a).

2.5 REGULATORY HISTORY

CPS first notified EPA of hazardous waste activities on August 18, 1980 (CPS, 1980). The facility submitted an original RCRA Part A Hazardous Waste Permit Application on July 2, 1982, indicating that it was a treatment, storage, or disposal (TSD) facility (CPS, 1982a). CPS requested EPA to withdraw its Part A application on July 27, 1982 (CPS, 1982b). EPA responded with a withdrawal of the Part A application on August 6, 1982 (U.S. EPA, 1982). The facility resubmitted a Part A permit application on July 2, 1985 for the storage of 75,000 gallons of hazardous waste in containers (S01) (CPS, 1985). Waste codes included D001, D007, and D008. The facility never applied for a RCRA Part B permit, air operating permits, or NPDES permits.

CPS submitted a closure plan for the CSA October 14, 1988 (CEE, 1988). EPA contractor, A.T. Kearny, reviewed the facility closure plan on February 9, 1989 (A.T. Kearny, 1989). OEPA conducted an interim status/closure activity inspection at the facility in May 1989. As a result of the inspection, OEPA sent the facility a letter advising it not to resume operations without complying with closure regulations. OEPA also sent a closure plan disapproval letter to the facility on July 6, 1989 (OEPA, 1989). CPS contracted OHM to submit a modified closure plan on August 4, 1989 (OHM, 1989). The closure plan was modified by OEPA on November 21, 1989 (OHM, 1990).

On February 8, 1990, OHM Corporation requested an amendment to the approved closure plan (OHM, 1990). The amendment was requested due to analytical results of final rinsate samples obtained during closure activities. Although a subsequent group of rinsate samples obtained on January 26, 1990, did not meet all criteria for total metals (chromium and lead), it appeared that additional cleanings would result in only marginal concentration reductions. OEPA approved the amended plan on May 3, 1990 (OEPA, 1990a). On May 29, 1990, OEPA conducted a closure certification inspection at the facility. In a letter from OEPA to CPS dated June 11, 1990, OEPA stated that the facility appeared to have been properly closed (OEPA, 1990b).

In December, 1988, the 2,000- and 3,000-gallon USTs were pumped dry and the piping was removed according to Rule 1301:7-7-34 of the Ohio Administrative Code. On January 21,

1989, the units were filled and capped with concrete. Samples from the surrounding area showed no sign of release. On January 27, 1989, the 6,000-gallon UST was removed from the ground. The tank was in good condition, and samples taken from the surrounding area showed no sign of release. All UST closure activities were overseen by the Clyde Fire Department (CFD, 1989).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the CPS facility.

2.6.1 Climate

Sandusky County, Ohio, experiences midwestern weather conditions. The average daily temperature is 49.7°F. The minimum average daily temperature is 15.7°F in January, and the maximum average daily temperature is 84.2°F in July (USDA, 1987).

The total annual precipitation is approximately 33 inches. Of this, nearly 60 percent (approximately 20 inches) falls between April and September. The mean annual lake evaporation for the county is between 32 and 34 inches. The one year 24-hour rainfall is approximately 2.5 inches (DOC, 1989).

2.6.2 Flood Plain and Surface Water

The nearest surface water body to the CPS facility is Raccoon Creek, located adjacent to the property on the west side. The CPS facility does lie within the 100-year flood plain of the creek (HUD, 1979). Raccoon Creek flows north approximately 11 miles to Muddy Creek Bay of Lake Erie. An unnamed pond is located approximately 200 feet southwest of the facility. Both surface water bodies are used for recreation.

2.6.3 Geology and Soils

The area surrounding the CPS facility is dominated by soils of the Hoytville-Nappanee association. This soil association is characterized by very poorly drained, fine- and medium-textured soils in broad flats and depressions on lake plains. These silty clay loamy soils were formed in glacial till modified by water movement (USDA, 1987).

No geologic investigations have been conducted at the CPS facility, and no boring logs exist. The regional geology of the area surrounding the CPS facility is characterized by post-

glacial clay and sandy sediments, originating from Lake Erie depositions. Sediment deposits in the area have low permeabilities. The glacial till sediments are underlain by the Greenfield formation, a carbonate limestone-dolomite bedrock. The Silurian-Age limestone-dolomite bedrock in the area ranges from 50 to 110 feet in thickness. Well logs from properties approximately 1,500 feet to the west have the following stratigraphy: approximately 35 feet of predominantly clay with some sand, 20 feet of gravels, and limestone bedrock ranging from 50 to 71 feet (ODNR, 1953).

2.6.4 Ground Water

According to well logs received from the Ohio Department of Natural Resources (ODNR), wells in the vicinity of the CPS facility have static ground-water levels ranging from 25 to 35 feet below ground surface (bgs). Well logs also indicate the water producing aquifer to be the Greenfield formation, a limestone-dolomite bedrock. The depth to bedrock begins at 55 feet bgs, and the average water level is approximately 70 feet bgs. According to the well logs, clay, gravel, and some sand lenses overlie the limestone bedrock.

According to ground-water resources of Sandusky County, the nearest ground-water pumping well for the City of Clyde is located approximately 1.25 miles from the facility. The ground water yield at this location is 10 gallons per minute at 71 feet bgs in the limestone aquifer.

2.7 RECEPTORS

The CPS facility occupies 1 acre of land in a primarily residential area of Clyde, Ohio. The population of Clyde is 5,700. There are two elementary schools and one high school in the area.

The CPS facility is bordered on the west by Raccoon Creek, and on the north, south and east by residential areas, consisting of primarily small single-family homes. The nearest residence is located adjacent to the facility on the west side. Two elementary schools are located approximately 600 feet to the east, and one unnamed pond is located approximately 200 feet southwest of the facility. A park is located approximately 1,000 feet south of the facility.

A ground water reservoir that supplies the City of Clyde with drinking water is located approximately 1 mile southeast of the facility. The nearest production well for the reservoir is located approximately 1.25 miles northeast of the facility and is 71 feet deep. The nearest industrial well is located approximately 1.30 miles to the south and is 55 feet deep. The nearest residential well is located approximately 0.3 miles west of the facility.

The surface water body nearest to the facility is the adjacent Raccoon Creek. Surface water in the area is used for recreation. A wetland area is located over 4 miles northeast of the facility, and no other sensitive environments are in the area.

The facility is completely fenced and locked when no facility personnel are on site.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 4 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1	**Container Storage Area**
Unit Description:	This unit was located inside the recycling building. The dimensions of this unit were approximately 110-feet by 60-feet. The unit was constructed of concrete with a design load of 3,000 pounds per square foot and a capacity of 1,363 55-gallon drums (Photos 1 through 4, 7 and 8).
Date of Startup:	The facility filed a Part A permit application for this unit on July 2, 1985. However, the facility has been operating since 1951.
Date of Closure:	The facility ceased using this unit in October, 1985. The facility first submitted a closure plan for the CSA on October 14, 1988. After several revisions, a modified closure plan was approved by OEPA on November 21, 1989. During decontamination of the CSA, the first two rounds of rinsate samples showed elevated levels of metals (chromium and lead). The third round of rinsate samples showed concentration reductions. OEPA then conducted a closure certification inspection at the facility and certified that the CSA was properly closed in a letter dated July 11, 1990.
Wastes Managed:	This unit managed D007 and D008 paint sludges in 55-gallon containers. The sludge waste was EP toxic for chromium and lead. This unit also managed spent mineral spirits (D001) and toluene waste (F003) in 55-gallon containers.
Release Controls:	The CSA was located on a concrete floor inside the recycling building. The building walls and the concrete floor were used for containment. There are numerous floor drains leading to the sanitary sewer located in this area.
History of Release:	This unit has no known history of release.

Observations:	At the time of the inspection, PRC observed that the CSA no longer stored any containers of waste, and PRC observed no evidence of releases.
SWMU 2	**Outdoor 6,000-Gallon Underground Storage Tank**
Unit Description:	This unit was located outdoors on the west side of the building, adjacent to the facility driveway. According to Lynn Naggy, the UST contained product xylene. However, according to the facility closure plan and OEPA, this unit may have contained hazardous waste. This unit was constructed of carbon steel and had a capacity of 6,000 gallons (Photos 9, 11 and 12).
Date of Startup:	This unit began operation in approximately 1960.
Date of Closure:	On January 27, 1989, the tank was removed from the ground. According to the Clyde Fire Department, the tank was in good condition, and no leaks or ground contamination was noted.
Wastes Managed:	This unit managed waste xylene (F003).
Release Controls:	This unit had no known release controls.
History of Release:	This unit has no known history of release.
Observations:	At the time of the inspection, PRC observed the 6,000-gallon empty tank located at the south end of the property. PRC observed no signs of releases in the area where the unit was located. The area where this unit was located was well vegetated.
SWMU 3	**Indoor 3,000-Gallon Underground Storage Tank**
Unit Description:	This unit was located beneath the recycling building below the eastern portion of the CSA. According to Lynn Naggy, the UST contained product mineral spirits. However, according to the facility closure plan and OEPA, this unit may have contained

	hazardous waste. This unit was constructed of carbon steel and had a capacity of 3,000 gallons (Photo 6).
Date of Startup:	This unit began operation in approximately 1960.
Date of Closure:	In December, 1988, this unit was pumped dry, and the piping was removed according to Rule 1301:7-7-34 of the Ohio Administrative Code. On January 21, 1989, Clyco Cement Co. filled this unit with 11 cubic yards of concrete and capped the top of the tank with approximately 1 foot of concrete.. A concrete vibrator was used to level the concrete in the tank, and all tank closure activities were overseen by the Clyde Fire Department.
Wastes Managed:	This unit managed waste mineral spirits (D001).
Release Controls:	This unit had no known release controls.
History of Release:	This unit has no known history of release.
Observations:	At the time of the inspection, PRC observed the area where the unit was located. The floor was filled with concrete, and PRC observed no evidence of a release.
SWMU 4	**Indoor 2,000-Gallon Underground Storage Tank**
Unit Description:	This unit was located beneath the recycling building below the eastern portion of the CSA. According to Lynn Naggy, the UST contained product butyl alcohol. However, according to the facility closure plan and OEPA, this unit may have contained hazardous waste. This unit was constructed of carbon steel and had a capacity of 2,000 gallons (Photo 5).
Date of Startup:	This unit began operation in approximately 1960.

Date of Closure:	In December, 1988, this unit was pumped dry, and the piping was removed according to Rule 1301:7-7-34 of the Administrative Code. On January 21, 1989, Clyco Cement Co. filled this unit with 5 cubic yards of concrete and capped the top of the tank with approximately 1 foot of concrete. A concrete vibrator was used to level the concrete in the tank, and all closure activities were overseen by the Clyde Fire Department.
Wastes Managed:	This unit managed waste butyl alcohol.
Release Controls:	This unit had no known release controls.
History of Release:	This unit has no known history of release.
Observations:	At the time of the inspection, PRC observed the area where the unit was located. The floor was filled with concrete, and PRC observed no evidence of a release.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI.

AOC 1 Unidentified Container

PRC identified one 55-gallon drum of unknown contents outside the southern end of the recycling building that used to belong to the CPS facility. PRC observed the 55-gallon drum lying on the ground with a valve on the bottom. The drum was covered with dried paint. PRC considers this an AOC because according to facility files, all of the containerized waste was removed in 1985, and there is potential for release from the container. There was no evidence of release from this container at the time of the inspection.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 4 SWMUs and 1 AOC at the CPS facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the CPS facility and suggested further actions.

SWMU 1 **Container Storage Area**

Conclusions: The CSA was located on a concrete floor within a building. The probability of a release to environmental media was minimal. The unit has been certified closed by OEPA. The probability of a release to environmental media is summarized below.

Ground Water: Low. This unit was situated on a concrete floor within a building, limiting the possibility for a release.

Surface Water: Low. This unit was situated on a concrete floor within a building. However, PRC noted that there were no berms around the unit and several sewer drains are also located in the building.

Air: Low. This unit was located within a closed building, limiting the possibility of release.

On-site Soils: Low. This unit was situated on a concrete floor within a building, limiting the possibility for a release.

Recommendations: This unit has been decontaminated and certified closed by OEPA. PRC recommends no further action for this unit.

SWMU 2 **Outdoor 6,000-Gallon Underground Storage Tank**

Conclusions: This unit was located underground with no known release controls. The probability of a release to environmental media was moderate. The probability of a release to environmental media is summarized below.

TABLE 3
SWMU AND AOC SUMMARY

	SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1.	Container Storage Area	7/85 to 6/90	None	No further action
2.	Outdoor 6,000-gallon UST	1960 to 9/90	None	No further action
3.	Indoor 3,000-gallon UST	1960 to 9/90	None	No further action
4.	Indoor 2,000-gallon UST	1960 to 9/90	None	No further action

	AOC	Operational Dates	Evidence of Release	Suggested Further Action
1.	Unidentified Container	Unknown	Unknown	Analyze contents and remove container from site

Ground Water: Low to moderate. This unit was situated outdoors, underground with no known release controls. However, there is no evidence of release from this unit.

Surface Water: Low to moderate. This unit was situated outdoors underground, with no known release controls to nearby Raccoon Creek.
Air: Low. This unit was situating outdoors, underground, limiting the possibility of release.

On-site Soils: Low to moderate. This unit was situated outdoors, underground, with no known release controls to the soils.

Recommendations: This unit has been decontaminated and removed. PRC recommends no further action for this unit.

SWMU 3 **Indoor 3,000-Gallon Underground Storage Tank**

Conclusions: This unit was located underground with no known release controls. The probability of a release to environmental media was moderate. The probability of a release to environmental media is summarized below.

Ground Water: Low. This unit was situated underground with no known release controls. However, there is no evidence of release from this unit.

Surface Water: Low. This unit was situated underground. The recycling building acted as secondary containment for surface water, limiting the possibility of release.

Air: Low. This unit was situated underground. The recycling building acted as secondary containment for air, limiting the possibility of release.

On-site Soils: Low. This unit was situated underground. The recycling building acted as secondary containment for on-site surface soils, limiting the possibility of release.

Recommendations: This unit has been decontaminated and removed. PRC recommends no further action for this unit.

SWMU 4 **Indoor 2,000-Gallon Underground Storage Tank**

Conclusions: This unit was located underground with no known release controls. The probability of a release to environmental media was moderate. The probability of a release to environmental media is summarized below.

Ground Water: Low. This unit was situated underground with no known release controls. However, there is no evidence of release from this unit.

Surface Water: Low. This unit was situated underground. The recycling building acted as secondary containment for surface water, limiting the possibility of release.

Air: Low. This unit was situated underground. The recycling building acted as secondary containment for air, limiting the possibility of release.

On-site Soils: Low. This unit was situated underground. The recycling building acted as secondary containment for on-site surface soils, limiting the possibility of release.

Recommendations: This unit has been decontaminated and removed. PRC recommends no further action for this unit.

AOC 1 **Unidentified Container**

This drum poses a small threat of release. The drum has no release controls, and PRC observed evidence of dried paint on the exterior of the drum. In addition, the drum contents are unknown. CPS should have the contents of the drum analyzed, and the drum should be removed from the site.

REFERENCES

A.T. Kearny, 1989. Technical Review of CPS Closure Plan dated October 14, 1988, February 9

Chemical and Environmental Engineering, Inc. (CEE), 1988. Closure Plan for CPS, October 14.

Clyde Fire Department (CFD), 1989. Clyde Fire Department Certification of Underground Storage Tank Removals, January 21 and 27.

Clyde Paint and Supply (CPS), 1980. Notification of Hazardous Waste Activity, August 18.

CPS, 1982a. Original RCRA Part A Permit Application, July 2.

CPS, 1982b. Withdrawal of RCRA Part A Permit Application letter from Robert Thomas, CPS, to Karl J. Klepitsch, U.S. EPA, July 27.

CPS, 1985. Revised RCRA Part A Permit Application, July 2.

PRC Environmental Management, Inc. (PRC), 1991. Telephone conversation memo between Jeffery A. Steers, Solid and Hazardous Waste Management, OEPA, and Deb Harrity, PRC, September 6.

Ohio Department of Natural Resources (ODNR), 1953. Well Log and Drilling Report, July.

Ohio Environmental Protection Agency (OEPA), 1989. Closure Plan Disapproval letter from Richard L. Shank, Director, to Gerry Thomas, CPS, July 6.

OEPA, 1990a. Closure Plan Approval letter from Edward A. Litchen, Hazardous Waste Management, to Gerry Thomas, CPS, May 3.

OEPA, 1990b. Closure Certification letter from Jefferey A. Steers, Solid and Hazardous Waste Management, to Gerald Thomas, CPS, July 11.

OHM Corporation (OHM), 1989. Closure Plan for the CPS facility, August 4.

OHM, 1990. Amendment of Closure Plan for CPS Container Storage Area, February 8.

United States Department of Agriculture (USDA), 1987. Soil Survey of Sandusky County, Ohio, July.

United States Department of Commerce (DOC), 1989. Monthly Normals of Temperature, September.

United States Department of Housing and Urban Development (HUD), 1979. Flood Insurance Rate Map, April 2.

United States Environmental Protection Agency (U.S. EPA), 1982. Withdrawal of RCRA Part A Permit Application, August 6.

United States Geological Survey (USGS), 1969. Southwest 1/4 of Bellevue 15' Quadrangle Topographic Map.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD 005 048 459

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Clyde Paint and Supply Company	435 West Mulberry Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Clyde	OH	43410	Sandusky		
09 COORDINATES: LATITUDE	**LONGITUDE**				
41° 18' 30.3"	82° 58' 34.3"				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Take Maple Street south to Mulberry, west on Mulberry

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Mr. Gerald Thomas	301 Lisa Ann Drive		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Huron	OH	44839	( ) Unavailable
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Naggy Auto Body	435 West Mulberry Street		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Clyde	OH	43410	(419) 547-8447

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 08 /18 /80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 05 /21 /91
☐ NO

BY *(Check all that apply)*

☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*	03 YEARS OF OPERATION
☐ A. ACTIVE ■ B. INACTIVE ☐ C. UNKNOWN	1951 / 1985 (BEGINNING YEAR ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The facility recycled paint sludges (D007 and D008) and generated F003 and D001 solvent waste.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

None

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Lynn Naggy	Naggy Auto Body			(419) 547-8477
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Deb Harrity		PRC	(312) 856-8700	5 / 21 / 91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD 005048459

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ■ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ■ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON 0

CUBIC YARDS 0

NO. OF DRUMS 0

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☐ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ■ G. FLAMMABLE
- ■ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	0		Facility is closed, no longer generating waste
OLW	OILY WASTE			
SOL	SOLVENTS	0		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
NA					

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	NA		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

EPA FORM 2070-12(7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	OHD 005048459

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ *(Acres)* — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE: OH	02 SITE NUMBER: OHD 005048459

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None, facility is closed and no releases have occurred.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None, facility is closed and no releases have occurred.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Ohio Environmental Protection Agency

Lynn Naggy, Naggy Auto Body (currently operating at facility)

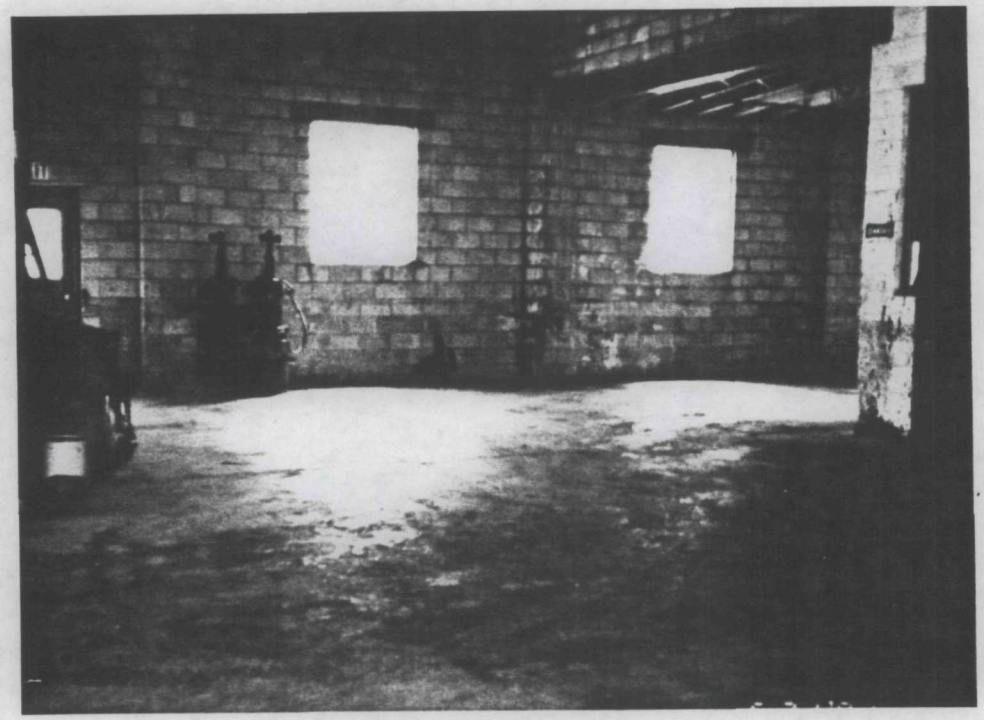
ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Clyde Paint and Supply Company
435 Mulberry Street, Clyde, Ohio
OHD 005 048 459

Date:	May 21, 1991
Facility Representatives:	Lynn Naggy, Naggy Auto Body
Inspection Team:	Deb Harrity, PRC Environmental Management, Inc. Paul Wooldridge, PRC Environmental Management, Inc.
Photographer:	Deb Harrity
Weather Conditions:	Sunny, temperature between 80° and 85°F
Summary of Activities:	The VSI began at 10:30 AM EST with an introductory meeting with Lynn Naggy, of Naggy Auto Body, the facility that currently owns and operates the CPS site. The meeting consisted of questions and answers regarding Lynn Naggy's knowledge had of past CPS activities. Lynn Naggy discussed CPS past operations and facility closure activities. At 11:40 AM EST Lynn Naggy gave PRC inspectors a tour of the Naggy Auto Body facility. Lynn Naggy showed the inspection team the areas where CPS conducted recycling and waste management operations. The inspection team photographed areas of past CPS waste management operations and closed CPS units. The tour concluded at 12:15 PM EST when Lynn Naggy showed the inspection team the surrounding area and adjacent surface water body. The VSI was completed at 12:25 PM EST.

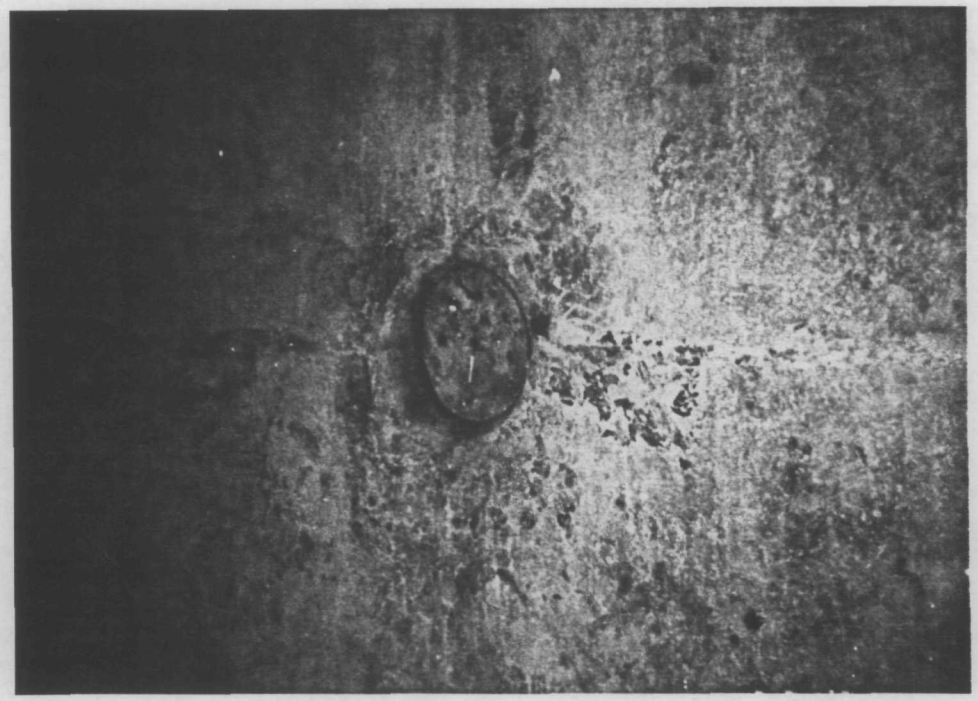


Photograph No. 1
Orientation: Southeast
Description: Closed CSA on the first floor of the recycling building.

Location: SWMU 1
Date: 05/21/91

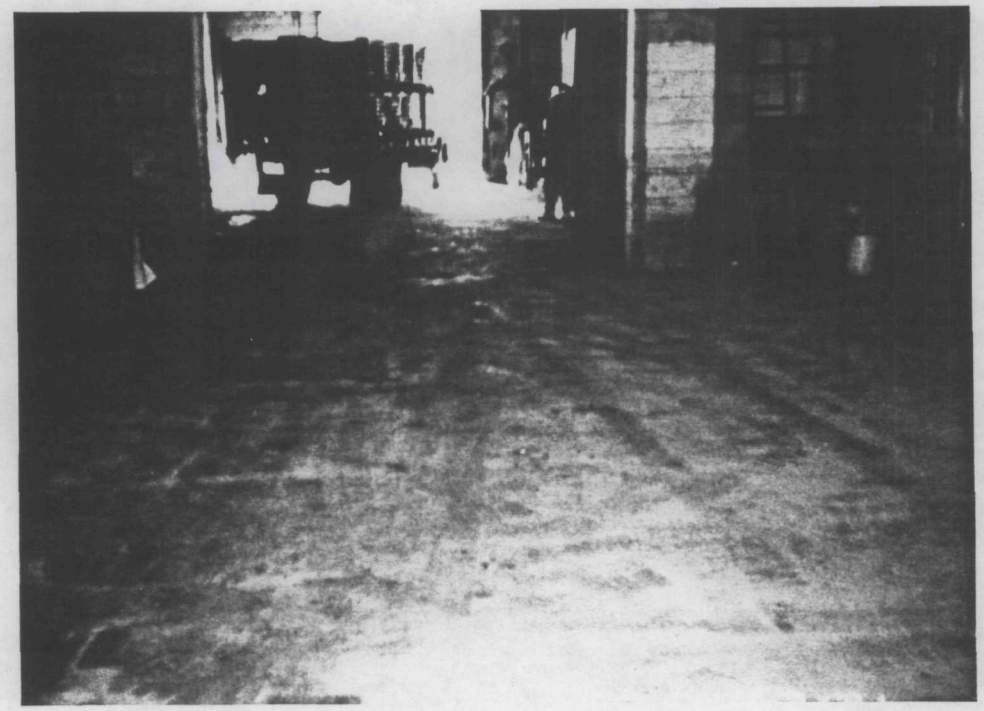
Photograph No. 2
Orientation: Southeast
Description: Closed CSA on first floor of recycling building.

Location: SWMU 1
Date: 05/21/91



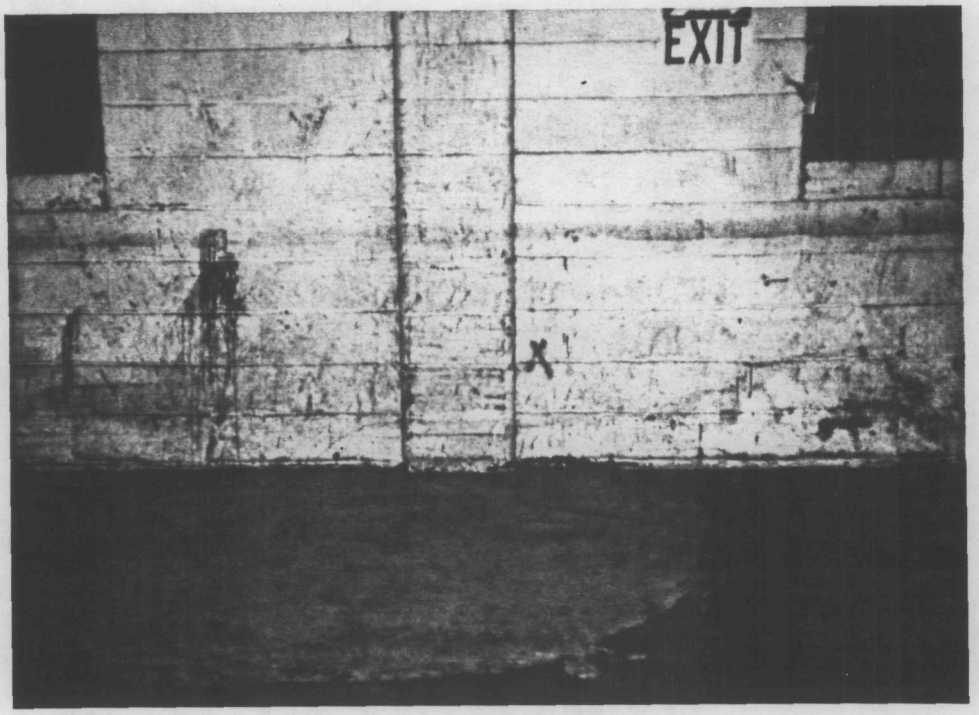
Photograph No. 3
Orientation: East
Description: Floor drain in closed CSA on first floor of recycling building.

Location: SWMU 1
Date: 05/21/91

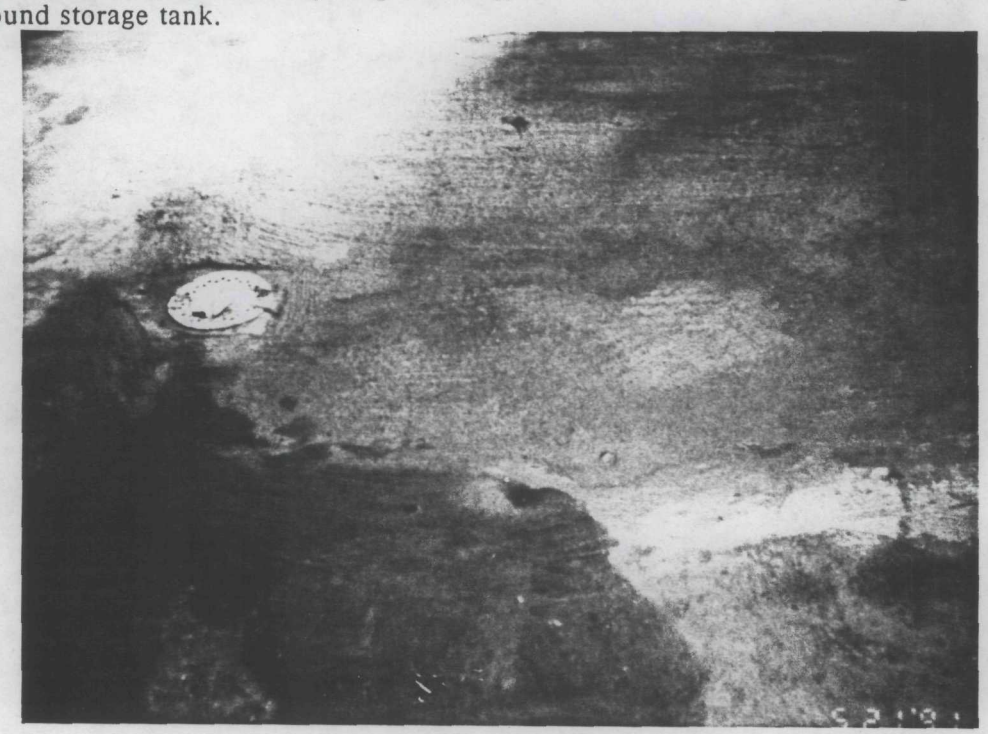


Photograph No. 4
Orientation: North
Description: Floor drain in closed CSA on first floor of recycling building.

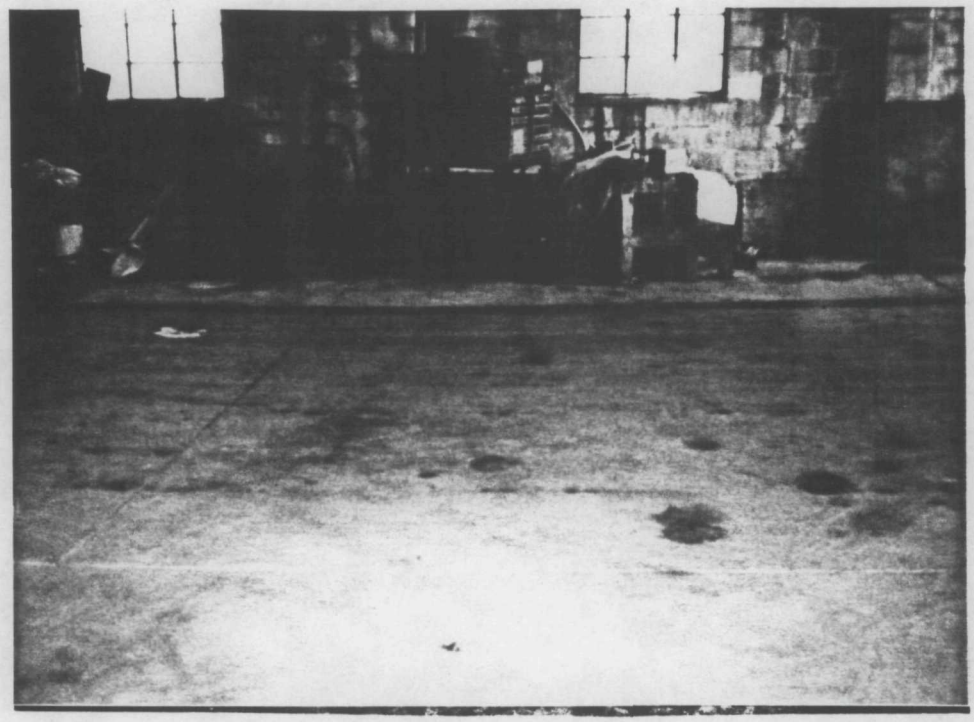
Location: SWMU 1
Date: 05/21/91



Photograph No. 5 Location: SWMU 4
Orientation: West Date: 05/21/91
Description: Northeast end of recycling building; floor drain and closed 2,000-gallon underground storage tank.

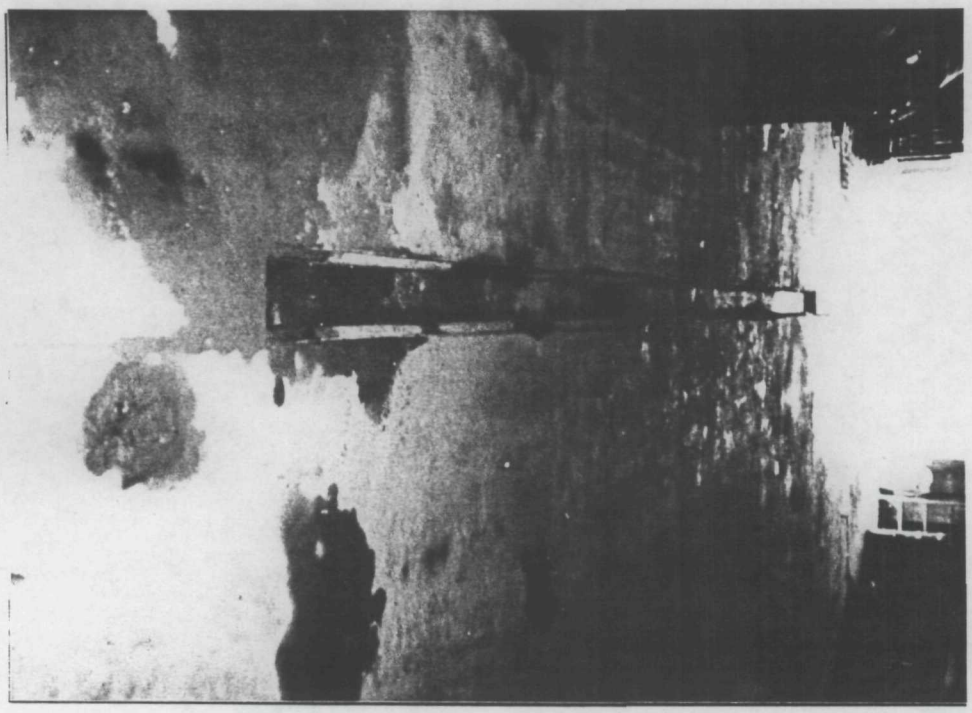


Photograph No. 6 Location: SWMU 3
Orientation: East Date: 05/21/91
Description: Northeast end of recycling building; floor drain and 3,000-gallon underground storage tank.



Photograph No. 7
Orientation: East
Description: Southeast end of recycling building; floor drain and closed CSA.

Location: SWMU 1
Date: 05/21/91

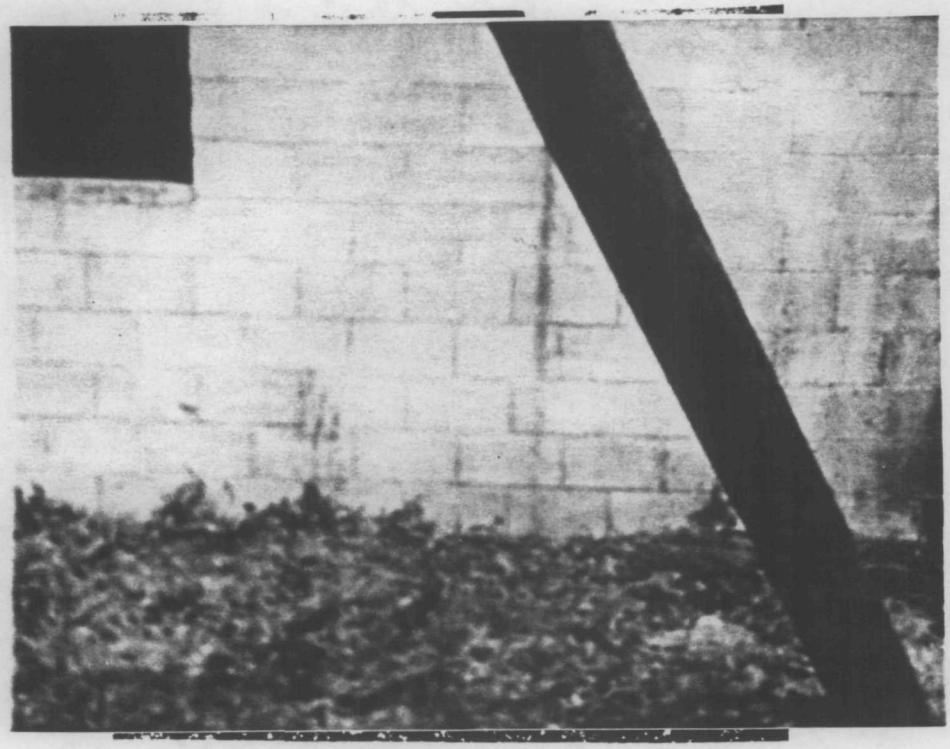


Photograph No. 8
Orientation: South
Description: Southeast end of recycling building; floor drain and closed CSA.

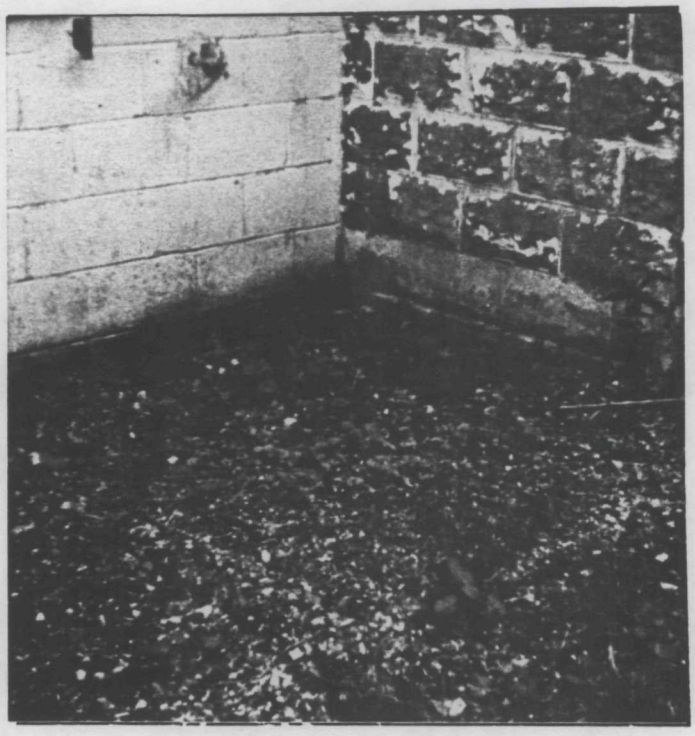
Location: SWMU 1
Date: 05/21/91

Photograph No. 9 Location: SWMU 2
Orientation: South Date: 05/21/91
Description: Southern end of property; empty 6,000-gallon UST removed from ground.

Photograph No. 10 Location: AOC 1
Orientation: West Date: 05/21/91
Description: Outdoors, southern end of building; one 55-gallon container that belonged to CPS facility. Note valve on bottom and paint dried on side of drum.



Photograph No. 11 Location: SWMU 2
Orientation: North Date: 05/21/91
Description: Outdoors, southwest end of recycling building; area where the 6,000-gallon UST was located.



Photograph No. 12 Location: SWMU 2
Orientation: Southeast Date: 05/21/91
Description: Outdoors, southwest end of recycling building; area where piping from the 6,000-gallon UST was routed.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

5-21-91 PW Weather sunny, 70s-80s

1040 PW, DH Arrive at Clyde Paint facility.

PW Interview of Lynn Nagy. July 1988 - Building was for sale

LN PAW Came to look at property → UST's were still there → product in them

Dec. 1988 - began Clean-up

3 UST's

2,000 gal Inside

3000 "

6,000 Gal Outside

Tanks were vacuum pumped out by Jerry Thomas, cleaned ~~the Tho~~ PW tanks out also. Tightness test (pressure) was conducted on tanks (2,000 + 3,000 Gal)

- Jerry Thomas hired someone to clean & test tanks

Then LN began managing property

2,000 } ~~Hired OH materials~~ PAW
3,000 } Gal tanks

- dug down to tank top, cut off hole in top & filled w/ cement slurry. Overseen by Fire Dept.

- Certified tank closed.

Soil samples were collected and analyzed → showed "clean"

6,000 gal tank outside

- was excavated and removed

- 2 soil samples were collected and analyzed

- showed clean

- The above work was done by LN. Other work completed by J.T. and his contractors.

OH Materials pressure - washed ~~building~~ PDW the container storage area → pumped out water → tested water for chemical cont. - did not pass 1st time → ~~passed~~ 2nd time PDW

OH materials hired by Jerry Thomas

Jerry Thomas
(419) 443-6564
- Son of owner
- Also treasurer ("or some position like that")
- JT was not notified about ERA's inspection

Former owner = Robert Thomas
- Now in a rest home
- Alzheimer's disease

L N came in to property in 1988 after clean-up
- equip. for paint shop was gone by then
- Now L & B Enterprises

Drinking water?
- people on city water from treatment plant
- supplied by reservoirs

Surface Waters?
- Ditch along property
- Any record of spills?
- Not to recollection of L N
- big flood in 1968
- Ditch = Raccoon Creek, along West end of property

34

5-21-91 PW

LEB Enterprises
- completes contractor work for Whirlpool
- Repair of metal storage crater
- painting (small scale)
- other general contract work

Lynn W. had at one time suffered health problems related to carbon monoxide poisoning / lead paints and isocyanides.
- quit paint operations

LN called friend @ water treatment plant
Brad Biggs
547-9407
- nearest wells BB knows of would be @ reservoir

35

5-21-91

LN bid on PW property starting in Dec. 1988
- Bank / Insurance Co would not give out loan or insurance until the property had been cleaned and certified
- This is why LN cleaned out tanks and had worked w Jerry Thomas to get drum storage area cleaned.

Loan was secured in August 1990.

LN Equipment was cleaned out (OH M helped), waste was drummed and disposed of Equip was then sold as scrap metal.

36

5-21-91 PW

1134 Back to OHM's work on drum storage area.
- Mistake previously noted re: rinsate samples
- first 2 rinsate samples failed tests
- 3rd rinsate sample showed reduction in contaminant levels (PW levels).

DH had some questions re: OH EPA's certification of closure
- discussed confusion relating to OEPA correspondence and approval.

37

5-21-91 PW

Current use of property
- Building close to 14,000 ft²
- Not sure how large prop.

Some lacre thinners stored for paint thinning → less than 5 gal at a time.

Work includes welding, scraping and painting structures (storage boxes).

1140 Tour facility - DH, PW, LN

Pictures:

1,2 facing SE
Former ~~UST~~ PW drum storage area area in Garage
- 1st floor of bld

3 Drain port @ N. end of bld, near office door, facing E.
- Drains to storm sewer.

P.4 Drain at S end of bld plus ~~HST~~ PDW former drum storage area, NW end of bld, facing N.

P.5 Drain + former ℄ UST area - facing W, area where 2,000 Gal tank was, NE. end of bld

P.6 Floor drain + former UST Area where 3,000 gal tank was, NE end of bld, facing E

P.7 facing E, SE end of bld former drum storage area plus trench drain on floor ~ 6" wide, 4" deep, 30' long running N - S → drain in center that connects to drain @ N. end of bld. (storm sewer)

5-21-91 PW

Scrap metal, damaged metal storage bins scattered along walls of garage at SE end

LN also keeps cars and work truck here - no used oil storage

Drums in small room at S end of ℄ Garage ~4 drums filled w/ wood scraps - another drum w/ small amount of debris (rusted metal.

P.8 Trench drain, facing S

P9 6,000 gal tank outside building in yard - S end of property - facing S

5-21-91 PW

Steel fence surrounds yard w gate at SW corner of bld.
Gate kept locked, building also kept locked when noone is on property.

P. 10 Drum outside S. end of bld that used to belong to paint facility facing W

Drum is on ground, laying on side. valve at bottom
Paint dried on outside of drum
Also 3-5 plastic drums discarded in same pile, plastic drums used for thinner in past. - LN says

5-21-91 PW

1200 they are probably 10 yrs old

6,000 gal tank area - outside the W ~~end~~ [PW] side of bld, S. end
Tank sat underground, part-way under building, and in a N-S direction; piping ran SE under ground & into building

P. 11 facing N, where tank used to be buried, SW end of bld.

P12 facing SE - a route that piping ran, according to LN. (facing building)

PDa?

42 5-21-91 PW

Room at West side of bld.
- Was used for production
PW
~~of~~ in paint processes
- cleaned out, except for steel beams that held equipment.

Racoon creek borders drive on W side of building
~ 10' - 15' wide, shallow
This = closest surface water to site.

1220 Finish inspection, wrap-up.

1225 PW, DH offsite.